

## **REMARKS**

**[0002]** Applicant respectfully requests reconsideration and allowance of all of the claims of the application. The status of the claims is as follows:

- Claims 2-12 and 23-33 are currently pending.
- Claims 34-40 were previously canceled.
- Claims 1 and 13-22 are canceled herein.
- Claims 2-12 and 23-33 are amended herein.

## **Allowed Claims**

**[0003]** Applicants express appreciation to the Examiner for acknowledging the presence of allowable subject matter in claims 11 and 32. Without additional comment and without prejudice as to the merits of the Examiner's rejections, Applicants have amended claims and canceled claims in order to expedite the issuance of the subject matter acknowledged as being allowable, and without prejudice to the filing of subsequent divisional or continuation applications to pursue allowance of one or more of the rejected claims. Accordingly, Applicants respectfully request reconsideration of the application in view of the foregoing amendments and the following remarks.

**[0004]** Applicant amends claims 11 and 32 to address informalities. In addition, Applicant has amended claims 2-10, 12 and claims 23-31, 33 to depend from claims 11 and 32 respectively.

### **Drawing Objections**

[0005] The Office objected to the drawing as not showing every feature of the invention specified in the claims, namely the feature of "storing the list of search terms" in claims 1 and 11. Claim 1 is canceled. Applicant has amended said recitation in claim 11 with "transmitting, via a network interface, the list of the suggested search terms to a user." Support for this amendment can be found in the drawings in Fig. 4, element 406, and Fig. 8, element 870. No new matter has been added. Accordingly, Applicant submits that the rejection to the drawings is now moot.

### **Claim Objections**

[0006] Claims 26 and 29 stand objected to as allegedly lacking antecedent basis. Applicant has amended the claims, as suggested by the Office. Applicant thanks the Office for the suggested amendment.

### **Claims 11 and 32 Comply With § 112 1st Paragraph**

[0007] Claims 1, 11, 13, 22 and 32 stand rejected under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement. Applicant respectfully traverses this rejection. Applicant has canceled claims 1, 13, and 22.

[0008] The Office states "the limitation 'identifying intra(inter)-layer relationships . . . based on user interaction with the multi-type data objects' does not appear in the specification." (Office Action, page 3, lines 13-14). Applicant removed the recitation "identifying *intra-layer* relationships . . . based on user interaction with the multi-type

data objects" from claims 11 and 32. Applicant has maintained the recitation of "identifying *inter-layer* relationships . . . based on user interaction with the multi-type data objects." Applicant relies on at least paragraphs [0024], [0039], and [0047] of the Specification in support of this recitation as follows (emphasis added).

- Paragraph [0024], lines 6-11 states "Such multi-type data objects include term(s) of mined historical search queries that have been enhanced with semantic context . . . mined from results obtained by . . . a set of web pages selected by a user responsive to a particular historical search query."
- Paragraph [0039], lines 4-9 states "In one implementation, "other MDOs" 218 include, for example, end-user selected Web pages and/or user specific information, wherein the user is one associated with submitting a historical query 216 to a search engine 228. STS module 212 extracts end-user selected Web pages from query log(s) 220."
- Paragraph [0047], lines 3-4 states "Content related information, for example, links within a historical query 216 and corresponding ones of user selected (clicked-thru) Web pages."

**[0009]**Applicant respectfully submits that the above quoted portions of the specification provide the necessary written description to convey to one skilled in the relevant art that the inventors, at the time the application was filed, had possession of the claimed invention, namely the recitation of "identifying intra(inter)-layer relationships . . . based on user interaction with the multi-type data objects." No new matter has been added. Accordingly, Applicant submits that claims 11 and 32 are allowable.

### **Claims 12 and 33 Comply With § 112 2nd Paragraph**

[0010] Claims 1, 12, 21 and 33 stand rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite. Applicant respectfully traverses this rejection. Claim 1 and 21 are canceled.

[0011] Nevertheless, for the sole purpose of expediting prosecution and without acquiescing in the propriety of the Office's rejections, Applicant herein amends claims 12 and 33 as shown above. Applicant respectfully submits that these amendments render the § 112, second paragraph, rejection moot.

### **Other Claim Amendments**

[0012] Applicant has amended claims 6 and 27, *sua sponte*, to correct informalities.

### **§ 102 Rejections**

[0013] Claims 1-10, 12-31 and 33 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Haahr et al, U.S. Patent Application Publication No. 2005/0055341 (hereinafter "Haahr"). Applicant respectfully traverses the rejection.

[0014] Applicant has canceled claims 1, 13-22, and 34-40 to expedite prosecution and without prejudice to the possibility of reinstatement during the prosecution of the subject application, and without prejudice to the filing of subsequent continuation or divisional applications. Claims 2-10, 12, 22-33, and 33 depend from base claims 11 or 22, and are thus allowable based on their dependency to an allowable base claim.

## Conclusion

[0015]Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Examiner is urged to contact the undersigned representative for the Applicant before issuing a subsequent Action.

Respectfully Submitted,

Lee & Hayes, PLLC  
Representative for Applicant

  
Dated: 7/11/23  
Damon J. Kruger (damonk@leehayes.com; 206-876-6018)  
Registration No. 60400